

CALIFORNIA WASTEWATER CLIMATE CHANGE GROUP

1737 North First Street, Suite 300, San Jose, California 95112

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Pollution Control Plant*

August 27, 2009

Mr. Christopher Calfee
Special Counsel
California Air Resources Board
1017 "L" Street, #2223
Sacramento, CA 95814

Dear Mr. Calfee:

CWCCG Comments on the Natural Resources Agency's July, 2009 Proposed Changes to the CEQA Guidelines

The California Wastewater Climate Change Group (CWCCG) is a statewide coalition of wastewater treatment agencies. Approximately 90% of California's municipal wastewater is treated by CWCCG members. This coalition has reviewed the Resources Agency's efforts to incorporate climate change into the CEQA Guidelines and wish to highlight one of our concerns.

We feel that any greenhouse gas proposal, CEQA or otherwise, should distinguish between anthropogenic emissions of CO₂ and those CO₂ emissions derived from activities that mimic the natural short-term carbon cycle, i.e., biogenic emissions.

In the short-term carbon cycle, atmospheric CO₂ absorbed by plants during photosynthesis can take several paths before reentering the atmosphere as CO₂¹. Activities such as renewable fuel combustion, respiration and the release of CO₂ from municipal wastewater treatment plants all return atmospheric CO₂ absorbed by plants weeks earlier. Unlike fossil-fuel emissions that release carbon entombed deep underground for centuries, these "biogenic" carbon dioxide emissions do not change the atmospheric concentration of CO₂.

We are concerned that CEQA significance thresholds under discussion do not distinguish between fossil-fuel based and other anthropogenic emissions of carbon dioxide vs. renewable or biogenic emissions of carbon dioxide.

If no distinction is made between these two, for example, the combustion of renewable fuels could falsely trigger a determination of significance. CEQA should not discourage the use of renewables or non-fossil fuel carbon as that would frustrate a key strategy needed to combat climate change.

¹ See BAAQMD, Staff Report Proposed Amendments to BAAQMD Regulation 3: Fees, p. 15, May 12, 2008.

We ask that the Resources Agency advise lead agencies that biogenic emissions exert no net adverse impact on the environment. Consequently, the Resources Agency should also advise that these biogenic emissions should NOT be considered in any "bright-line" significance threshold nor any performance standard under CEQA.

We thank you for this opportunity to provide you with our concerns and look forward to discussing these issues with you further. If you have any questions or comments, please contact Patrick Griffith at (562) 908-4288 ext. 2117.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Griffith", written over a horizontal line.

California Wastewater Climate Change Group

cc: Ian Peterson
Kirk Miller
Jackie Kepke